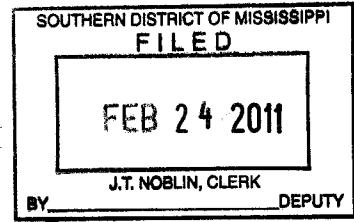


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**



MYRON W. LOCKEY, JR.

PLAINTIFF

VERSUS

CIVIL ACTION 11cv70 LG-RHW

CMRE FINANCIAL SERVICES, INC.

DEFENDANTS

NOTICE OF REMOVAL

Defendant CMRE Financial Services, Inc., by and through counsel, hereby gives notice of the removal of this action from the Circuit Court of Jackson County Mississippi, to the United States District Court for the Southern District of Mississippi. In support of this Notice of Removal, Municipal Services Bureau states as follows:

1. This action was originally commenced by plaintiff Myron W. Lockey, Jr. on January 14, 2011, through the filing of a Complaint in the Circuit Court of Jackson County Mississippi styled *Myron W. Lockey, Jr. v. CMRE Financial Services, Inc.* being Civil Action No. 2011-00010(1).

2. The United States District Court for the Southern District of Mississippi, Gulfport Division is the court, district and division embracing the place wherein such action is pending in state court.

3. This removal is effected by the sole defendant and has been timely filed within thirty (30) days of the removing defendant being served with process and within one (1) year after commencement of the action, as allowed by 28 U.S.C. § 1446(b).

4. This Court has jurisdiction over this matter and it is properly removed to this Court pursuant to U.S.C. §§ 1331 and 1441.

5. This case may be removed to this Court based on 28 U.S.C. §§ 1331 and 1441. Plaintiff seeks recovery based upon his allegations of violations the Fair Debt Collection Practices Act, 15 U.S.C. § 1692 et seq.

6. The resolution of plaintiff's claims necessarily requires an interpretation of substantial federal issues.

7. Pursuant to 28 U.S.C. § 1446(d), all adverse parties are being provided with a copy of this Notice of Removal, and a copy of this Notice of Removal is being filed with the Clerk of the Circuit Court of Jackson County, Mississippi.

8. A copy of all pleadings previously filed in the state court action and/or all process, pleadings and orders served on the removing defendant is attached hereto as Exhibit "A."

9. Consistent with the provisions of 28 U.S.C. § 1446(d), no further proceedings shall be had in this matter in the Circuit Court of Jackson County, Mississippi.

WHEREFORE, the Defendant, Municipal Services Bureau, files this Notice of Removal and removes this civil action to the United States District Court, Southern District of Mississippi, Gulfport Division.

Respectfully submitted, this 24th day of February, 2011.

CMRE FINANCIAL SERVICES, INC.

By Its Attorneys
WATKINS LUDLAM WINTER & STENNIS, P.A.

By:


William V. Westbrook, III

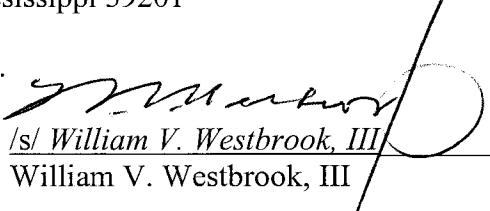
William V. Westbrook, III (MS Bar No. 7119)
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CERTIFICATE OF SERVICE

I, William V. Westbrook, III, hereby certify that I electronically filed the foregoing with the Clerk of Court using the ECF system which sent notification of such filing to all counsel of record registered for electronic service and that I served the above via U. S. Mail upon:

Joseph Patrick Frascogna, Esq.
Frascogna & Frascogna, PLLC
234 East Capitol Street, Second Floor
Jackson, Mississippi 39201

This, the 24th day of February, 2011.


/s/ William V. Westbrook, III
William V. Westbrook, III